

Sarah J. Tugman
Attorney at Law
2509 Eide Street, Suite 4
Anchorage, Alaska 99503
Telephone: (907) 677-7889
Fax: (907) 677-9188
e-mail: sjtugman@gci.net
Attorney for GMW Fire Protection, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

| | | |
|----------------------------------|---|-------------------------------|
| |) | |
| THE UNITED STATES for the use of |) | |
| GMW Fire Protection, Inc., |) | |
| an Alaska Corporation, |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | |
| |) | |
| KANAG'IQ CONSTRUCTION CO., INC., |) | |
| an Alaska Corporation and |) | |
| WESTERN SURETY COMPANY, a |) | |
| South Dakota Corporation, |) | |
| |) | |
| Defendant. |) | |
| <hr/> | |) Case No. A-05-0170 CV (TMB) |

OPPOSITION TO DEFENDANT'S 8/27/08 MOTION
TO STAY EXECUTION

Defendants have *again* moved to alter of amend the judgment entered in this case, and have *again* moved to stay execution. As GMW stated in its opposition to the motion to amend, Defendants' successive motions appear motivated only by a desire to cause unnecessary delay and to needlessly increase the cost of litigation. If Defendants do not wish Plaintiff to execute, Defendants should post supersedeas bonds. It is a misuse of the motion to amend a judgment to use it to avoid execution.

Defendants motions should be denied.

Respectfully submitted this 27th day of August, 2008.

s/ Sarah J. Tugman
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Anchorage, Alaska 99503
Phone: (907) 677-7889
Fax: (907) 677-9188
E-mail: sjtugman@gci.net
Alaska Bar No.: 8310101

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2008, a copy of the foregoing document was served electronically on Tom Gingras, attorney for Kanag'Iq Construction, Inc.

s/Sarah J. Tugman
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